

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JOCELYNE MOSBY,

Plaintiff,

v.

SAFELITE FULFILLMENT, INC.

d/b/a SAFELITE AUTOGLASS

Defendant.

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C.A. NO. 3:24-cv-03067-K

JURY TRIAL DEMANDED

JOINT STATUS REPORT

Pursuant to this Court's Order Requiring Scheduling Conference entered December 31, 2024, Plaintiff, Jocelyn Mosby ("Plaintiff"), and Defendant Safelite Fulfillment, Inc. d/b/a Safelite AutoGlass ("Defendant"), hereby provide their Joint Status Report to the Court as follows:

1. A brief description of the nature of the case and the claims and defenses.

Plaintiff alleges sex discrimination under Title VII of the Civil Rights Act of 1964. Defendant denies Plaintiff's allegations and states that it terminated Plaintiff's employment for legally justified reasons.

2. The identity of any related proceedings.

None.

3. A proposed deadline by which to file motions for leave to join other parties.

March 1, 2025.

4. A proposed deadline by which to amend pleadings.

March 1, 2025.

5. A proposed deadline by which to file various types of motions, including dispositive motions. (The Court prefers the deadline for dispositive motions to be 120 days before trial.)

November 14, 2025.

6. A proposed deadline for initial designation of experts.

June 2, 2025.

7. A proposed deadline for responsive designations of experts.

July 2, 2025.

8. A proposed deadline for objections to experts (i.e., *Daubert* and similar motions).

October 2, 2025.

9. A proposed plan and schedule for discovery, a statement of the subjects on which discovery may be needed, a time limit to complete factual discovery and expert discovery, and a statement of whether discovery should be conducted in phases or limited to particular issues.

The parties propose October 14, 2025, as the discovery deadline for factual discovery. The parties will engage in discovery on Plaintiff's allegations and Defendant's defenses. The parties propose September 2, 2025, as the deadline for expert discovery.

10. Any changes which should be made in the limitations on discovery imposed under the Federal Rules of Civil Procedure or by local rule, and any other limitations which should be imposed.

None. The parties will conduct discovery according to the Federal Rules of Civil Procedure and the local rules.

11. A proposed trial date as well as an estimated number of days required for trial, and whether a jury has been properly demanded. (The Court operates a three-week docket beginning the first Monday of each month, therefore the parties should propose a trial date accordingly.)

The parties propose March 2, 2026, for the trial date and request four (4) days for trial.

Plaintiff demanded a jury trial in her Complaint (Dkt. No. 1). Defendant requested a jury trial in its Answer (Dkt. No. 6).

12. A proposed date for further settlement negotiations.

The parties will have further informal settlement discussions by April 30, 2025.

13. Objections to Fed. R. Civ. P. 26(a)(1) asserted at the Scheduling Conference, and other proposed modifications to the timing, form, or requirements for disclosure under Rule 26(a), including a statement as to when disclosures under Rule 26(a)(1) were made or will be made.

No objections. The parties will provide initial disclosures within 14 days after their initial conference which occurred on January 17, 2025.

The Parties agree that all electronically stored information will initially be produced in text-searchable Portable Document Format (“PDF”), except for Excel files, which shall be produced in native format. The Parties agree that this does not constitute specification, for purposes of Rule 34(b)(2)(E)(ii), of the form for producing ESI. If a receiving party would like a copy of any ESI in a different format, it can make such a request to the proffering party, and the information will be produced by the proffering party unless such party can show undue burden or cost in producing the information in the requested format.

14. Whether the parties will consent to trial (jury or non-jury) before a U.S. Magistrate Judge (consent attached).

The parties do not consent to trial before a U.S. Magistrate Judge.

15. Whether the parties are considering mediation or arbitration to resolve this litigation and a statement of when alternative dispute resolution would be most effective (*e.g.*, before discovery, after limited discovery, after motions are filed, etc.).

The parties will consider mediation after dispositive motions are filed.

16. Any other proposals regarding scheduling and discovery that the parties believe will facilitate expeditious and orderly preparation for trial

None.

17. Any other matters relevant to this case.

None.

Respectfully submitted,

<p>LAW OFFICE OF DONALD E. ULOTH</p> <p><u>/s/Donald E. Uloth*</u> Donald E. Uloth (TBN 20374200) 18208 Preston Road, Suite D-9 #261 Dallas TX 75252 T: (214) 989-4396 Don.uloth@uloth.pro Attorney for Plaintiff, Jocelyne Mosby * Signed with permission.</p>	<p>VORYS, SATER, SEYMOUR AND PEASE LLP</p> <p><u>/s/Monica A. Fitzgerald</u> Monica A. Fitzgerald (TBN 07088320) Hamed Moradi (TBN 24121020) 909 Fannin Street, Suite 2700 Houston, TX 77010 T: (713) 588-7000 mafitzgerald@vorys.com hmoradi@vorys.com Attorneys for Defendant Safelite Fulfillment, Inc. d/b/a Safelite AutoGlass VORYS, SATER, SEYMOUR AND PEASE LLP</p> <p><u>/s/Jason Mueller</u> Jason Mueller [TBN 24047571] 909 Fannin Street, Suite 2700 Houston, TX 77010 T: 713.588.7000 F: 713.588.7050 jmueller@vorys.com Local Counsel</p>
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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2025, I electronically filed the foregoing *Joint Status Report* with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/Monica A. Fitzgerald
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